

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America

v.

LARRY WOODY

Case No.

2:20-MJ-112

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 5, 2020, in the county of Potter in the
Northern District of Texas, the defendant(s) violated:

Code Section

18 USC 641

Offense Description

Theft of Government Funds

This criminal complaint is based on these facts:

see attached affidavit in support of complaint.

☒ Continued on the attached sheet.

s/ Jeremy Gooden

Complainant's signature

Jeremy Gooden, TIGTA SA

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/07/2020

City and state: Amarillo, Texas

Lee Ann Reno

Judge's signature

Lee Ann Reno, United States Magistrate Judge

Printed name and title

Print

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2:20-MJ-112

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jeremy Gooden, being duly sworn, depose and state as follows:

Introduction and Background of Affiant

1. Your Affiant makes this Affidavit in support of a Criminal Complaint against **Larry Woody**. Your Affiant has probable cause to believe that on or about April 5, 2020, in the Northern District of Texas, Amarillo Division, **Woody** violated Title 18, United States Code, Section 641, Public money, property or records. This Affidavit is limited in scope to the information relevant to the charge contained in the criminal complaint and is not an exhaustive account of all information pertaining to **Woody** or to this investigation.

Affiant's Experience

2. Affiant has been a Special Agent for over five years with the Treasury Inspector General for Tax Administration. During that time, Affiant has worked on numerous federal criminal investigations. Affiant has worked with other agents, police officers, and law enforcement personnel who have extensive criminal investigative experience and training. Through training and participation in criminal investigations, Affiant has become familiar with and has participated in the following methods of investigations, including, but not limited to, electronic surveillance, visual surveillance, questioning of witnesses, and the use of search warrants and undercover agents. In the course of such investigations, Affiant has made numerous arrests.

3. The grounds for issuance of the criminal complaint are derived from the Affiant's review of an internal data base, bank records, and interviews of persons who have personal knowledge of the events described herein.

The Investigation

4. On or about April 28, 2020, Jennifer Gray reported her ex-boyfriend **Woody** put his bank account number on her 2019 tax documents without her consent. This allowed **Woody** to obtain Gray's CARES Act stimulus payment without her consent as it was deposited into **Woody's** bank account. The following are facts of the investigation:
5. On April 5, 2020, Gray was at **Woody's** residence in Amarillo, Texas, and Gray began preparing her taxes through her mobile phone via e-file.com. While preparing her taxes, Gray put her phone down and went to the bathroom. She did not finish preparing her taxes when she returned.
6. Later that day, Gray received an e-mail from the Internal Revenue Service informing her that her taxes had been submitted successfully. Gray found this odd because she had not submitted her return. Gray asked **Woody** if he had submitted her taxes, and he informed her that he had submitted the taxes. **Woody** told Gray that he thought that she would not mind because she had a negative balance with the bank and the bank would take her refund.
7. Gray discovered **Woody** had put his bank account information on the tax documents without Gray's permission while she was in the bathroom. Gray informed **Woody** that she did not consent to **Woody's** actions and that **Woody** was wrong.
8. A review of Internal Data Retrieval System records show Gray's stimulus payment was deposited into Amarillo National Bank account # XXXX5970.

9. A review of Internal Data Retrieval System records show WOODY's stimulus payment was deposited into the same Amarillo National Bank account # XXXX5970.
10. A review of records associated with ANB account # XXXX5970 show the account belongs to **Larry Woody**. The records further indicate the account received two \$1,200.00 IRS stimulus payments on April 22, 2020, and on April 29, 2020, respectively.

Conclusion

11. Based on the above-described investigation, evidence gathered to date, and Affiant's training and experience, your Affiant believes probable cause exists that on or about on or about April 5, 2020, in the Northern District of Texas, Amarillo Division, **Woody** violated Title 18, United States Code, Section 641, Public money, property or records. THEREFORE, Affiant respectfully requests this Court authorize the issuance of a Criminal Complaint and Arrest Warrant for **Woody**.

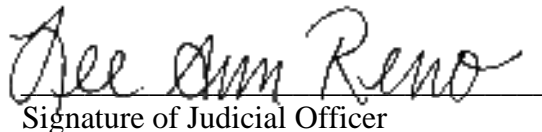
/s/ Jeremy Gooden

Jeremy Gooden
TIGTA SA

Sworn to before me, and subscribed in my presence

August 7, 2020 at Amarillo, Texas
Date City and State

Lee Ann Reno U.S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer